

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Criminal Case No. 23-CR-951-MLG
)	
vs.)	
)	
ASHLEY GLEASON,)	
)	
Defendant.)	

**UNITED STATES' RESPONSE TO
DEFENDANT'S OPPOSED MOTION TO RECONSIDER THE DETENTION ORDER**

The United States respectfully submits this response in opposition to Defendant's Opposed Motion to Reconsider the Detention Order, filed on February 22, 2024. *See* Doc. 43. Therein, Defendant provides new information that she was accepted to Darrin's Place inpatient drug and alcohol treatment center after the detention hearing.

The Court should deny Defendant's motion because drug treatment cannot adequately address or correct the justifications for detention outlined in the Court's Order of Detention Pending Trial—including that Defendant faces a lengthy prison term, has criminal history, has participated in crimes while on court supervision, and has failure to appear history. *See* Doc. 15 at 2-3. Relatedly, the concerns noted in the Pretrial Services Report, including "[v]iolent [b]ehavior [h]istory," would not be corrected at Darrin's Place. *See* Doc. 12 at 3. Finally, Darrin's Place is a non-secure facility that requires voluntary compliance from admittees, and the Defendant cannot be relied upon to comply. Because Defendant's attendance at Darrin's Place does not change the calculus of safety to the community or Defendant's appearance at court hearings, the motion should be denied.

Respectfully Submitted,

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I HEREBY CERTIFY that a copy of this document was filed electronically through the Court's CM/ECF system, which is designed to serve copies of this document to counsel of record.

/s/ Peter Haynes
Peter Haynes